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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ZOHO CORPORATION,

Plaintiff,

v.

SENTIUS INTERNATIONAL, LLC

Defendant.

CASE NO. 4:19-cv-00001-YGR

**STIPULATION AND ~~PROPOSED~~
ORDER RE EXTENSION OF
CERTAIN CASE SCHEDULE
DEADLINES**

SENTIUS INTERNATIONAL, LLC,

Counterclaimant,

v.

ZOHO CORPORATION and ZOHO CORPORATION PVT., LTD.

Counter-Defendants.

Pursuant to Civil Local Rules 6-2 and 7-12, the parties, by and through their respective Counsel hereby stipulate to move the deadlines for fact discovery and expert reports as recited in the table below. These changes are necessary in order to accommodate the scheduling and conducting of depositions in light of COVID-19 related orders and concerns. Many of the witnesses are overseas, including at least one key witness in Japan, which has complicated scheduling of depositions due to travel restrictions and Japan's preclusion of video depositions.

The parties previously stipulated to extend by one week the deadlines for Plaintiff and Counter-defendant Zoho Corporation and Counter-defendant Zoho Corporation Pvt. Ltd. to respond to the counterclaims of Defendant and Counterclaimant Sentius International, LLC and to serve Invalidity Contentions (Dkt. 42). The parties later stipulated to move the deadlines for serving Damage Contentions and Claim Construction exchanges (Dkt. 44) and the deadline for filing the Joint Claim Construction and Prehearing Statement (Dkt. 48). The parties later stipulated to extend the deadline for the close of fact discovery, exchange of expert reports and the filing of summary judgment motions (Dkt. 72). The parties have not made any other requested extensions and this stipulation affects only those recited that have been set by the Court.

Event	Current Deadline	New Deadline
Close of Fact Discovery	September 29, 2020	November 20, 2020
Opening Expert Reports	October 20, 2020	December 18, 2020
Rebuttal Reports	November 17, 2020	January 29, 2021
Close of Expert Discovery	December 22, 2020	February 24, 2021
Daubert/MSJs	January 26, 2021	March 24, 2021

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

1 Dated: September 9, 2020

CARR FERRELL LLP

2 By /s/ Robert J. Yorio
3 Robert J. Yorio

4 Attorneys for Defendant and Counterclaimant
5 SENTIUS INTERNATIONAL, LLC

6 Dated: September 9, 2020

MARTON RIBERA SCHUMANN
& CHANG LLP

8 By /s/ Ryan J. Marton
9 Ryan J. Marton


10 Attorneys for Plaintiff and Counter-Defendants
11 ZOHO CORPORATION and
12 ZOHO CORPORATION PVT., LTD.

13 **ORDER**

14 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.**
15 **PARTIES ARE CAUTIONED NOT TO EXPECT FURTHER EXTENSIONS.**

16 Dated: September 11, 2020

By:


17 Honorable Yvonne Gonzalez Rogers
18 Judge of the United States District Court
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